

Before the Federal Communications Commission
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Notice of Proposed Rulemaking
WT Docket No. 98-143

In the Matter of 1998 Biennial Regulatory Review—
Amendment of Part 97 of the Commission's Amateur Service Rules

Comments of

Christopher C. Campbell
1721 Notre Dame Avenue
Belmont, CA 94002
re: WT Docket No. 98-143
November 14, 1998

My qualifications for commenting on this proposal are that I am currently licensed as a Technician-Plus holder of the call letters N0NDF, but also hold the General Radiotelephone commercial license and the GMDSS Operator and Maintainer License (#DB-GB-041728). I had been licensed as an amateur with the Technician grade of license many years before the present call letters and license. I also was first licensed commercially in 1968, with the First Class Commercial Radiotelephone license. I am also speaking as one who has managed two-way radio

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shops, trained apprentices in the radio arts, taught the material necessary for them to take the commercial radio examinations (and pass with scores of 95% or better) and am a careful observer of the state of scientific and technical education in the United States. I am a graduate of one of the best and most thorough electronic engineering programs in the country— Metropolitan State College of Denver (Bachelor of Science, May 1988).

Thus, I am speaking to you from the point of view of one who believes, heart and soul, that one of the most important functions of amateur radio is as a tool for learning this art, and, as the Commission said so well in the introduction to Part 97, to "provide a reservoir of trained operators." This Notice of Proposed Rulemaking has the potential to be one of the best things that ever happened to amateur radio, provided that the things the FCC requested comment upon (most notably the tradeoff of a reduced Morse requirement versus a more serious theory examination) receive the needed attention.

It has been said that the manual Morse requirement serves as a "filter" to keep those who aren't serious about this avocation and those who would be a detriment to its well-being out of the ranks of amateur radio licensees. No doubt there is good solid reason and need to keep irresponsible and destructive people out of the hobby, but I can suggest much, much better filters than a manual skill which has little practical application in the real world of radiocommunications. As one who has desperately needed assistants and apprentices with some basic practical knowledge and understanding about transmitters, receivers, antennas, transmission lines, and just exactly who the FCC is and why there must be rule of law instead of chaos (particularly on the Maritime channels), I have almost made it a requirement that a job-seeker coming to me have an amateur radio license. But that pre-requisite is getting harder and harder to enforce every year, because the youth of this country are not attracted to a hobby with arcane requirements having no bearing on truly needed knowledge.

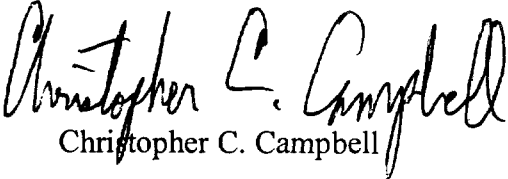
As to the question of exactly how to go about implementing the better, more appropriate filter which will bring us the right kind of people from all walks of life, I would suggest that we look at what other nations are doing. The Radio Society of Great Britain is proposing that, since we will not be able to modify the international treaty requiring Morse examinations for another

two to three years, we simply reduce the speed requirement to around 5 words per minute. This minimizes the amount of preparation time to a point that many more people would look seriously at the remainder of the study necessary to successfully complete the radio amateur examinations. At the same time, it behooves us to look at constructing a written test on theory and practice which will ensure that those holding the designations of amateur radio licensees will actually have the basic electronic and practical knowledge which hams used to be so famous and respected for having. That light can shine very brightly again. The basic foundation is, and should be, a working knowledge of receivers, transmitters, antennas and other basic electronic theory, familiarity with the legal requirements for legitimate operation and the reasons why those laws are in place. Then, particularly as the license class and its corresponding privileges rise, a basic knowledge of digital and other newer modes should be mandatory. I am speaking first and foremost of the telex modes— Amtor, Sitor, Pactor, and similar. But a few questions about spread spectrum and digitization of voice signals would probably be in order, along with other technologies which keep pushing the cutting edge forward.

Regardless of the exact speed or speeds chosen for Morse, it would behoove us to make our license classes very comparable to and compatible with the CEPT system of licensing now spreading to most of Europe. This should be the beginning of a single, universal, worldwide system of radio licensing which would ensure that all nations participating in any reciprocal licensing could be sure of the competency and knowledge base of all who operate with a reciprocal license. The reduction in paperwork and administrative needs would benefit every nation in the world, but perhaps the United States more than most.

Thank you for hearing these comments.

Sincerely,


Christopher C. Campbell